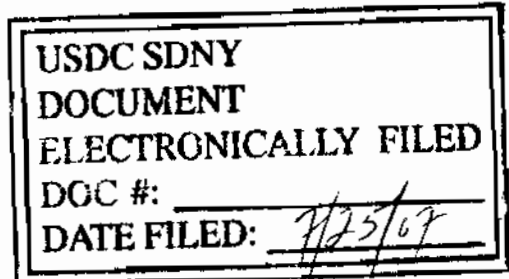




THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
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NEW YORK, NY 10007

MICHAEL A. CARDOZO  
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July 24, 2007

**BY FAX**

Honorable Loretta A. Preska  
United States District Judge  
Southern District of New York  
United States Courthouse  
500 Pearl Street, Room 1320  
New York, NY 10007

Re: Abu Camara v. City of New York, et al.  
07-CV-5874 (LAP)

Your Honor,

I am an attorney in the office of Michael A. Cardozo, Corporation Counsel of the City of New York, assigned to the defense of the above-referenced federal civil rights lawsuit. I write to respectfully request, *nunc pro tunc*, a sixty day enlargement of time for defendants City of New York and New York City Department of Homeless Services to answer or otherwise respond to the complaint from July 23, 2007, to September 21, 2007. Plaintiff's counsel Brett H. Klein, Esq., consents to this request.

There are several reasons for seeking an enlargement of time. In accordance with this office's obligations under Rule 11 of the Federal Rules of Civil Procedure, we need this additional time to investigate the allegations of the complaint. In this case, plaintiff alleges he was seized and assaulted by officers working for the New York City Department of Homeless Services in the vicinity of Camp Laguardia, a facility in Orange County then operated by the Department of Homeless Services. Plaintiff claims, *inter alia*, that he was punched in the ribs and then taken to a facility in the basement of Camp Laguardia. If plaintiff was arrested or given a summons, records of this incident may have been sealed pursuant to New York Criminal Procedure Law § 160.50. Therefore, this office is in the process of forwarding to plaintiffs' counsel for execution a consent and authorization for the release of those sealed records so that defendant can access the information, properly assess the case, and respond to the complaint. This office is also providing the plaintiff's counsel with medical authorizations to be executed by plaintiffs in order that we may assess the extent of plaintiffs' alleged physical and psychological injuries.

No previous request for an enlargement of time to respond to the complaint has been made. Accordingly, it is respectfully requested that defendants' time to answer or otherwise respond to the complaint be enlarged from July 23, 2007, to September 21, 2007.

Thank you for your consideration of this request.

SO ORDERED

*Loretta A. Preska*  
LORETTA A. PRESKA  
UNITED STATES DISTRICT JUDGE

*July 25, 2007*

Respectfully submitted,

*Jordan M. Smith*  
Jordan M. Smith (JS 7186)  
Assistant Corporation Counsel

cc: Brett H. Klein, Esq. (by fax)  
Attorney for Plaintiff